

**DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT**

**REDUCING BIRD DAMAGE
THROUGH AN
INTEGRATED WILDLIFE DAMAGE MANAGEMENT PROGRAM
IN THE STATE OF VERMONT**

Introduction

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS) program responds to requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions may be categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). To evaluate and determine if any potentially significant impacts to the human environment from WS' planned and proposed program would occur, an environmental assessment (EA) was prepared to evaluate WS' bird damage management activities in Vermont. The EA documents the need for bird damage management (BDM) in Vermont and assesses potential impacts of various alternatives for responding to damage problems. The EA analyzes the potential environmental and social effects for resolving bird damage related to the protection of resources, and health and safety on private and public lands in Vermont. WS' proposed action is to implement an Integrated Wildlife Damage Management (IWDM) program on public and private lands in Vermont. Comments from the public involvement process were reviewed for substantive issues and alternatives which were considered in developing the decision for the EA. A Decision and Finding of No Significant Impact (FONSI) were issued on June 14, 2004 for the aforementioned EA whereby Alternative 2 (Proposed Action) was selected.

The EA was prepared to: 1) facilitate planning and interagency coordination, 2) streamline program management, and 3) clearly communicate to the public the analysis of cumulative impacts. WS determined through the National Environmental Policy Act (NEPA) process that an Environmental Impact Statement was not required to conduct the current/proposed bird damage management activities in Vermont. The EA ensured WS' actions complied with NEPA, with the Council on Environmental Quality (40 CFR 1500), and with APHIS NEPA implementing regulations (7 CFR 372). All bird damage management activities are conducted consistent with: 1) the Endangered Species Act of 1973, including consultation with the U.S. Fish and Wildlife Service (USFWS), 2) Executive Order (EO) 13112¹, 13186², EO 12898³, and EO 13045⁴,

¹ Executive Order 13112 states that each Federal agency whose actions may affect the status of invasive species shall, to the extent practicable and permitted by law; 1) reduce invasion of exotic species and the associated damages, 2) monitor invasive species populations, provide for restoration of native species and habitats, 3) conduct research on invasive species and develop technologies to prevent introduction, and 4) provide for environmentally sound control, promote public education on invasive species.

² Executive Order 13186 directs federal agencies to protect migratory birds and strengthen migratory bird conservation by identifying and implementing strategies that promote conservation and minimize the take of migratory birds through enhanced collaboration between WS and the USFWS, in coordination with state, tribal, and local governments. A National-level MOU between the USFWS and WS is being developed to facilitate the implementation of Executive Order 13186.

³ Executive Order 12898 promotes the fair treatment of people of all races, income levels and cultures with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

⁴ Executive Order 13045 ensures the protection of children from environmental health and safety risks since children may suffer disproportionately from those risks.

3) the Federal Insecticide, Fungicide, and Rodenticide Act, 4) Federal, State and local laws, regulations and policies.

Annual monitoring reports have been prepared and issued for WS' bird damage management activities conducted during 2004, 2005 and 2006 to ensure WS' activities are within the scope of the EA (USDA 2005, USDA 2006). Based on the information provided in those monitoring reports, WS' integrated bird damage management activities were within the potential impact parameters analyzed in the EA and the 2004 Decision/FONSI remained valid.

In March 2007, an amendment to the EA was prepared and provided to the public for review and comment. The amendment analyzes the affected environment and impacts of increasing WS' avian disease monitoring program and for expanded gull damage management activities to assist with the restoration of native vegetation and wildlife to islands in Vermont. The amendment also reviews information, issues, and data that have become available since the Decision/FONSI was issued in 2004 and the last monitoring report completed for FY 2006 activities. This Decision/FONSI is based on the analysis in the 2004 EA, the 2004 Decision/FONSI, the annual monitoring reports, and the proposed amendment to the EA.

Agency Authority

WS is the Federal agency directed by law and authorized by Congress to reduce damage to agriculture, natural resources, property, and to resolve public health or safety concerns caused by wildlife. The primary statutory authorities for the APHIS-WS program are the Act of March 2, 1931 (46 Stat. 1468; 7 U.S.C. 426-426b) as amended, and the Act of December 22, 1987 (101 Stat. 1329-331, 7 U.S.C. 426c).

Under the Act of March 2, 1931, and 7 U.S.C. §426c, APHIS may carry out wildlife damage management programs, or enter into cooperative agreements with states, local jurisdictions, individuals and public and private agencies whereby they may fund and assist in carrying out such programs. WS' activities are conducted at the request of and in cooperation with other Federal, state, and local agencies, private organizations, and individuals. Accordingly, WS' authorities support and authorize its mission of providing Federal leadership and expertise to reduce problems caused by injurious and/or nuisance wildlife.

Purpose of the Amendment

The Amendment examines potential environmental impacts of WS' proposed and amended program as it relates to: 1) conducting disease surveillance in avian populations, particularly HP H5N1 AI, 2) increasing gull damage management activities to restore vegetation and wildlife diversity on islands in Vermont under the VTFW Champlain Islands Wildlife Management Area Long-Range Management Plan, and 3) new data that have become available from research findings and data gathering since the issuance of the 2004 Decision/FONSI and the monitoring report covering activities conducted in FY 2006.

Public Involvement

The amendment to the EA was released to the public for a 30-day comment period by a legal notice in the *Burlington Free Press* on March 12, 2007 and March 13, 2007. A notice of availability was also posted to WS' public website at http://www.aphis.usda.gov/wildlife_damage/nepa.shtml. A letter of availability for the amendment to the EA was also mailed directly to agencies, organizations, and individuals with probable interest in the proposed program. No comments were received from the public during the comment period. Comments were received from one federal resource agency. All comments were analyzed to identify

substantial new issues, alternatives, or to re-direct the program. Based upon these comments, several minor editorial and clarification changes to management actions have been incorporated into the EA. These minor changes enhanced the understanding of the proposed program, but did not change the analysis provided in the EA. All comments are maintained in the administrative file located at the Vermont State Wildlife Services Office, Parker Professional Center, 617 Comstock Road, Berlin, VT 05602.

Alternatives That Were Fully Evaluated

The following four alternatives were developed to respond to the issues. Five additional alternatives were considered but not analyzed in detail. Appendix B of the EA provides a description of the methods that could be used or recommended by WS under each of the alternatives. A detailed discussion of the effects of the Alternatives on the issues can be found in the EA; below is a summary of the Alternatives.

Alternative 1: Technical Assistance Only.

This alternative would not allow for WS' operational BDM in Vermont. WS would only provide technical assistance and make recommendations when requested. Producers, property owners, agency personnel, corporations, or others could conduct BDM using any legal lethal or non-lethal method available to them. A cooperator could complete an application (USDA –Wildlife Damage Report –Form 37A, Depredation Permit Application) for a depredation permit to take specified bird species from the USFWS. The USFWS permit issuance procedure would follow that described in Alternative 2. Currently, DRC-1339 and alpha-chloralose are only available for use by WS' employees. Therefore, use of these chemicals by others would not occur legally. However, the restricted use pesticide, Starlicide®, is similar to DRC-1339 and may be used by certified applicators if it becomes registered for use in the state. Avitrol® could also be used by state certified restricted-use pesticide applicators. For a complete list of publicly available methods for bird damage management see Appendix B in the EA.

Alternative 2: Integrated Bird Damage Management Program (Proposed Action/No Action).

USDA, APHIS, WS proposes to continue the current damage management program that responds to bird damage in the State of Vermont. An IWDM approach would be implemented to reduce bird damage to property, agricultural resources (including livestock), natural resources, and human/public health and safety. Damage management would be conducted on public and private property in Vermont when the resource owner (property owner) or manager requests assistance. An IWDM strategy would be recommended and used, encompassing the use of practical and effective methods of preventing or reducing damage while minimizing harmful effects of damage management measures on humans, target and non-target species, and the environment. Under this action, WS could provide technical assistance and direct operational damage management, including non-lethal and lethal management methods by applying the WS' Decision Model (Slate et al. 1992). When appropriate, physical exclusion, habitat modification or harassment would be recommended and utilized to reduce damage. In other situations, birds would be removed as humanely as possible using shooting, trapping, egg addling/destruction, nest destruction, and registered pesticides and other products. In determining the damage management strategy, preference would be given to practical and effective non-lethal methods. However, non-lethal methods may not always be applied as a first response to each damage problem. The most appropriate response could often be a combination of non-lethal and lethal methods, or could include instances where application of lethal methods alone would be the most appropriate strategy. Bird damage management activities would be conducted in the State, when requested and funded, on private or public property, including airport facilities and adjacent or nearby

properties, after an *Agreement for Control* or other comparable document has been completed. All management activities would comply with appropriate Federal, State, and Local laws, including applicable laws and regulations authorizing take of birds, and their nest and eggs.

Producers, property owners, agency personnel, corporations, or others could conduct BDM using any legal lethal or non-lethal method available to them. Following USFWS review of a complete justified application (USDA –Wildlife Damage Report –Form 37A, Depredation Permit Application) for a depredation permit from a property owner to take specified bird species, a depredation permit could be issued by USFWS. Upon receipt of a USFWS depredation permit, the permittee (or any listed sub-permittee) may commence the authorized activities and must submit a written report of their activities upon expiration of their permit to the USFWS. Permits may be renewed yearly by the USFWS as needed to resolve the damages, after going through the reauthorization process which includes justification. Not all of the methods listed in Appendix B of the EA as potentially available to WS would be legally available to property owners.

The recommended damage management program associated with the amendment includes: a) the take of up to 10,000 ring-billed gulls nests/eggs annually on Young Island, Lake Champlain by egg-oiling only; and only until such time that the nest count at the beginning of the year on Young Island is not below 1,000 nests; in addition, take up to 1,000 additional nests on other islands in Vermont Lake Champlain; b) implement a pilot project to take up to 10% of nesting ring-billed gulls on Young Island for up to three successive years by shooting in order to evaluate effects on co-nesting birds and recovery of native vegetation; and c) convert the pilot project to an operational project that could authorize a maximum take of 20% of the ring-bills nesting on Young Island each year after analysis of vegetation and other nesting birds recovery status, and a determination of potential impacts on the statewide and regional ring-billed gull population. Reevaluation of the ring-billed gull population goals may occur after five years, and would include modeling of the entire Lake Champlain ring-billed population under different management scenarios.

Alternative 3: Non-lethal Bird Damage Management Only by WS.

This alternative would require WS to use non-lethal methods only to resolve bird damage problems. Information on lethal BDM methods would still be available to producers and property owners through other sources such as USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information regarding lethal management approaches would be referred to Vermont Fish and Wildlife Department (VTFW), FWS, local animal control agencies, or private businesses or organizations. Individuals might choose to implement WS non-lethal recommendations, implement lethal methods or other methods not recommended by WS, contract for WS direct control services, use contractual services of private businesses, or take no action. Persons receiving WS' non-lethal technical and direct control assistance could still resort to lethal methods that were available to them. Under this alternative, property owners might be limited to using non-lethal techniques only. Because the USFWS needs professional recommendations on individual damage situations before issuing a depredation permit for lethal takes and the USFWS does not have the mandate or resources to conduct this work, state agencies with responsibilities for migratory birds would have to provide this information to the USFWS, such as VTFW. If the necessary information was provided to the USFWS, following the agency's review of a complete application package for a depredation permit from a property owner to lethally take birds causing damage, the permit issuance procedure would follow that described in Alternative 2.

Currently, DRC-1339 and alpha-chloralose are only available for use by WS employees. Therefore, use of these chemicals by others would be illegal. However, the restricted use pesticide, Starlicide®, is similar to DRC-1339 and may be used by certified applicators if it becomes registered for use in the state. Avitrol® could also be used by state certified restricted-use pesticide applicators.

Alternative 4: No Federal WS' Bird Damage Management.

This alternative would eliminate WS' involvement in BDM in Vermont. WS would not provide direct operational or technical assistance and requesters of WS' assistance would have to conduct their own BDM without WS' input. Information on BDM methods would still be available to producers and property owners through other sources such as USDA Agricultural Extension Service offices, universities, or pest control organizations. Requests for information would be referred to VTFW, FWS, local animal control agencies, or private businesses or organizations. Individuals might choose to conduct BDM themselves, use contractual services of private businesses, or take no action. DRC-1339 and alpha-chloralose are only available for use by WS' employees. Therefore, use of these chemicals by private individuals would be illegal. However, the restricted use pesticide, Starlicide®, is similar to DRC-1339 and may be used by certified applicators if it becomes registered for use in the state. Avitrol® could also be used by state certified restricted-use pesticide applicators. Under this alternative, property owners might be limited to using non-lethal techniques only. Because the USFWS needs professional recommendations on individual damage situations before issuing a depredation permit for lethal takes and the USFWS does not have the mandate or resources to conduct this work, state agencies with responsibilities for migratory birds would have to provide this information to the USFWS, such as VTFW. If the necessary information was provided to the USFWS, following the agency's review of a complete application package for a depredation permit from a property owner to lethally take birds causing damage, the permit issuance procedure would follow that described in Alternative 2.

Alternatives Considered but not Analyzed in Detail:

Lethal Bird Damage Management Only By WS

Under this alternative, WS would not conduct any non-lethal control of birds for BDM purposes in the State, but would only conduct lethal BDM. This alternative was eliminated from further analysis because some bird damage problems can be resolved effectively through non-lethal means. Additionally, lethal methods may not always be available for use due to safety concerns or local ordinances prohibiting the use of some lethal methods, such as the discharge of firearms. For example, a number of damage problems involving the encroachment of injurious birds into buildings can be resolved by installing barriers or repairing of structural damage to the buildings, thus excluding the birds. Further, damage situations such as large flocks of injurious birds on/near airport runways could not be alleviated immediately by lethal means, while scaring them away using various harassment devices might resolve the threat to passenger safety at once.

Compensation for Bird Damage Losses

The compensation alternative would require the establishment of a system to reimburse persons impacted by bird damage. This alternative was eliminated from further analysis because no federal or state laws currently exist to authorize such action. Under such an alternative, WS would not provide any direct control or technical assistance. Aside from lack of legal authority, analysis of this alternative in the ADC Final EIS indicated that the concept has many drawbacks (USDA 1997).

Compensation requires large expenditures of money, even when compensation is less than full market value when the cost of labor to investigate and validate all damage claims is included. Not all damage situations can be conclusively verified, such as irrefutably attributing disease outbreaks to the presence of birds, even though the birds are a likely cause. There would be little incentive for resource owners or managers to limit damage through tolerance or by implementing damage management methodologies. Compensation would not be practical for reducing threats to human health and safety.

Use of Bird-proof Feeders in Lieu of Lethal Control at Dairies and Cattle Feeding Facilities

Bird-proof cattle feeders are often a proposed alternative provided by the public and organizations with an interest in wildlife damage management as a method for excluding birds at dairies and cattle feeding facilities. Designs proposed either do not effectively exclude birds from entering the trough or interfere with the delivery of feed to the trough which increases feed waste (Twedt and Glahn 1982).

Exclusion methods to prevent birds from feeding on and contaminating feed at livestock operations are usually the least cost-effective solution (Twedt and Glahn 1982, Feare 1984). Despite the limitations of the bird-proof feeder system proposed by some members of the public and organizations, similar types of systems could be recommended by WS under the proposed program should any become available that are effective, practical, and economically feasible for producers to implement.

Short Term Eradication and Long Term Population Suppression

An eradication alternative would direct all WS program efforts toward total long term elimination of bird populations on private, State, Local and Federal government land wherever a cooperative program was initiated in the State. In Vermont, eradication of native bird species is not a desired population management goal of State agencies or WS. Eradication as a general strategy for managing bird damage will not be considered in detail because:

- All State and Federal agencies with interest in, or jurisdiction over, wildlife oppose eradication of any native wildlife species.
- Eradication is not acceptable to most people.

Suppression would direct WS program efforts toward managed reduction of certain problem populations or groups. In areas where damage can be attributed to localized populations of birds, WS can decide to implement local population suppression as a result of using the WS Decision Model.

It is not realistic or practical to consider large-scale population suppression as the basis of the WS program. Typically, WS activities in the State would be conducted on a very small portion of the sites or areas inhabited or frequented by problem species.

Nonlethal Methods Implemented Before Lethal Methods

This alternative is similar to Alternative 2 except that WS personnel would be required to always recommend or use nonlethal methods prior to recommending or using lethal methods to reduce bird damage. Both technical assistance and direct damage management would be provided in the context of a modified IWDM approach. Alternative 2, the Proposed Action, recognizes nonlethal methods as an important dimension of IWDM, gives them first consideration in the formulation of each management strategy, and recommends or uses them when practical before recommending or using lethal methods. However, the important distinction between the Nonlethal Methods First Alternative and the Proposed Alternative is that the former alternative would require that all nonlethal methods be used before any lethal methods are recommended or used.

While the humaneness of the nonlethal management methods under this alternative would be comparable to the Proposed Program Alternative, the extra harassment caused by the required use of methods that may be ineffective could be considered less humane. As local bird populations increase, the number of areas negatively affected by birds would likely increase and greater numbers of birds would be expected to congregate at sites where nonlethal management efforts were not effective. This may ultimately result in a greater numbers of birds being killed to reduce damage than if lethal management were immediately implemented at problem locations (Manuwal 1989). Once lethal measures were implemented, bird damage would be expected to drop relative to the reduction in localized populations of birds causing damage.

Since in many situations this alternative would result in greater numbers of birds being killed to reduce damage, at a greater cost to the requester, and result in a delay of reducing damage in comparison to the Proposed Alternative, the Nonlethal Methods Implemented Before Lethal Methods Alternative is removed from further discussion in this document.

Major Issues

The EA describes the alternatives considered and evaluated using the identified issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

- Effects on Target Bird Populations
- Effects on Other Wildlife Species, including T&E Species
- Effects on Human Health and Safety
- Impacts to Stakeholders, including Aesthetics
- Humaneness and Animal Welfare Concerns of Methods Used

Affected Environment

The proposed action in the EA and this amendment may be conducted on properties held in private, local, state or federal ownership. The areas of the proposed action, as amended, could include areas in and around commercial, industrial, public, and private buildings, facilities and properties and at other sites where birds may roost, loaf, feed, nest or otherwise occur. Examples of areas where wildlife damage management

activities could be conducted are, but are not necessarily limited to: agricultural fields, vineyards, orchards, farmyards, dairies, ranches, livestock operations, grain mills, grain handling areas, railroad yards, waste handling facilities, bridges, industrial sites, natural areas, government properties and facilities, private homes and properties, corporate properties, schools, hospitals, cemeteries, parks and recreation areas (including sports fields, playgrounds, swimming pools, etc.), swimming lakes, communally-owned homeowner/property owner association properties, natural areas, wildlife refuges, wildlife management areas, coastal and tidal beaches, ponds, rivers, and inlets, airports and surrounding areas.

Finding of No Significant Impact

Based on a review of information available since the completion of the EA, the 2004 Decision/FONSI, the analyses provided in the annual monitoring reports, and the proposed amendment, there continues to be no indications that WS' bird damage management activities in Vermont will have a significant impact, individually or cumulatively, on the quality of the human environment. I agree with this conclusion and therefore, find that an Environmental Impact Statement should not be prepared. This determination is based on the following factors:

1. Bird damage management as conducted by WS in Vermont is not regional or national in scope. Impacts of DCCO management that are regional or national in scope have been addressed and analyzed in the FWS DCCO FEIS.
2. The proposed action would pose minimal risk to public health and safety, including children. WS' activities do not uniquely pose public health and safety hazards to peoples of any race, income level, or cultures. No injuries to any member of the public are known to have resulted from these activities in the analysis areas. Risks to the public from WS' methods were determined to be low in a formal risk assessment (USDA 1997, Appendix P).
3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected. Built-in mitigation measures that are part of WS' standard operating procedures and adherence to laws and regulations will further ensure that WS activities do not harm the environment.
4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to wildlife damage management, this action is not highly controversial in terms of size, nature, or effect. Public controversy over DCCO management has been acknowledged and addressed in the FWS DCCO FEIS and the EA.
5. Based on the analysis documented in the EA, the 2004 FONSI and Decision, the subsequent annual monitoring reports, the amendment, and the accompanying administrative files, the effects of bird damage management activities on the human environment would not be significant. The effects of these activities are not highly uncertain and do not involve unique or unknown risks. The issue of uncertainty about effects of DCCO management in general has also been addressed in the FWS DCCO FEIS.
6. The proposed action would not establish a precedent for any future action with significant effects.

7. No significant cumulative effects were identified through this assessment. The EA, 2004 Decision/FONSI, annual monitoring reports, and the amendment discussed cumulative effects of WS' activities on target and non-target species populations and concluded that such impacts were not significant for this or other anticipated actions to be implemented or planned within the State. The FWS DCCO FEIS analyzed the potential for significant cumulative impacts on national and regional cormorant populations and other species from implementing cormorant damage management activities and has determined that such impacts would not be significant.
8. The proposed activities would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources. If an individual activity with the potential to affect historic resources is planned under the selected alternative, then site-specific consultation as required by Section 106 of the NHPA would be conducted as necessary.
9. WS has determined that the proposed project would not adversely affect any Federal or Vermont State listed threatened or endangered species. This determination is based upon concurrence from the FWS that the project will not likely adversely affect any threatened or endangered species in Vermont.
10. The proposed action, as amended, would be in compliance with all federal, state, and local laws.

Decision and Rationale

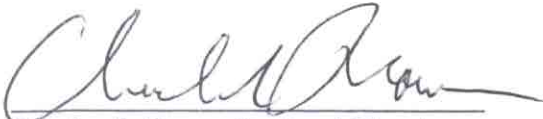
I have carefully reviewed the EA, the 2004 Decision/FONSI, the annual monitoring reports, the amendment prepared for the proposed action, and the input from the public involvement process. I find the current program to be environmentally acceptable, addressing the issues and needs while balancing the environmental concerns of management agencies, landowners, advocacy groups, and the public. The analyses in the EA, annual monitoring reports, and the amendment adequately addresses the identified issues which reasonably confirm that no significant impact, individually or cumulatively, to wildlife populations or the quality of the human environment have occurred or are likely to occur from the proposed action, nor does the proposed action constitute a major Federal action, including the proposed action as amended. Therefore, the analysis in the EA, as amended, remains valid and does not warrant the completion of an Environmental Impact Statement.

Based on the EA, 2004 Decision/FONSI and the monitoring reports, the issues identified are best addressed by continuing the current/proposed action, Alternative 2 (Integrated Bird Damage Management Program (Proposed Action/No Action), as amended, and applying the associated mitigation measures discussed in Chapter 3 of the EA. Alternative 2 successfully addresses bird damage management using a combination of the most effective methods and does not adversely impact the environment, human health and safety, property, and/or non-target species, including T/E species. Further analysis would be triggered if changes occur that broaden the scope of bird damage management activities, that affect the natural or human environment, or from the issuance of new environmental regulations.

Alternative 2 is selected because (1) it offers the greatest chance at maximizing effectiveness and benefits to resource owners and managers while minimizing cumulative impacts on the quality of the human environment that might result from the program's effect on target and non-target species populations; (2) it presents the greatest chance of maximizing net benefits while minimizing adverse impacts to public health

and safety; and, (3) it offers a balanced approach to the issues of humaneness and aesthetics when all facets of these issues are considered. The comments identified from public involvement were minor and did not change the analysis. Therefore, it is my decision to implement the preferred alternative, as amended, as described in the EA.

Copies of the EA are available upon request from the Vermont Wildlife Services Office, Parker Professional Center, 617 Comstock Road, Berlin, VT 05602.



Charles S. Brown, Regional Director
APHIS-WS Eastern Region

4/19/07

Date

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